

CRIMINAL COMPLAINT
(Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America v. Aldrick De La Torre DOB: 2005; United States Citizen Jesus David Casas Guerrero DOB: 2005; United States Citizen	DOCKET NO. MAGISTRATE'S CASE NO. <div style="text-align: center; font-weight: bold; font-size: 1.2em;">24-00490MJ</div>
Complaint for violation of Title 18, United States Code, §§ 554(a) and 2	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: On or about April 17, 2024, in the District of Arizona, Aldrick De La Torre and Jesus David Casas Guerrero knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: three (3) pistols, two (2) rifles, three (3) pistol magazines, and two (2) rifle magazines, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774; all in violation of Title 18, United States Code, Sections 554(a) and 2.	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On April 17, 2024, Aldrick De La Torre and Jesus David Casas Guerrero attempted to exit the United States and enter the Republic of Mexico through the outbound vehicle lane at the DeConcini Port of Entry (POE) in Nogales, Arizona. Customs and Border Protection Officers (CBPOs) were conducting outbound inspections when they stopped a 2008 Hyundai Accent bearing an Arizona license plate attempting to exit the United States and enter the Republic of Mexico. Aldrick De La Torre was the driver of the vehicle and Jesus David Casas Guerrero was the passenger. CBPOs took a negative outbound declaration for weapons and ammunition. A Canine Enforcement Officer (CEO) was requested to conduct a sniff of the vehicle. CASAS Guerrero and De La Torre were secured and moved to a secondary inspection area. The vehicle was inspected by a CBP Currency and Firearms Detector Dog (CFDD) and a trained canine alerted to the presence of a trained odor on the vehicle. In a subsequent search, CBPOs discovered three (3) pistols, two (2) rifles, three (3) pistol magazines, and two (2) rifle magazines concealed in the vehicle. One of the firearms was tucked in De La Torre's waistband. In a post- <i>Miranda</i> interview Casas Guerrero stated that he knew why he was there and that it was because he tried to bring guns into Mexico. Casas Guerrero stated he was recruited by an individual known as "Bryan" to travel to Phoenix, Arizona to retrieve weapons and return to Mexico to deliver the guns. Casas Guerrero	
(BASIS OF COMPLAINT CONTINUED ON REVERSE.)	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A	
DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY AUSA <u>R. Arellano</u> <small>RAQUEL ARELLANO Digitally signed by RAQUEL ARELLANO Date: 2024.04.18 14:01:17 -0700</small>	SIGNATURE OF COMPLAINANT <div style="display: flex; align-items: center;"> <div style="flex: 1;"> KEITH J GRIJALVA </div> <div style="font-size: 0.8em; margin-left: 10px;"> Digitally signed by KEITH J GRIJALVA Date: 2024.04.18 14:11:33 -0700 </div> </div> OFFICIAL TITLE HSI SA Keith J. Grijalva
Sworn by telephone <input checked="" type="checkbox"/>	
SIGNATURE OF MAGISTRATE JUDGE 	DATE April 18, 2024

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BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED.)

stated that this was the first time he personally smuggled weapons to Mexico. **Casas Guerrero** stated that he was going to be paid \$100 per gun he smuggled to Mexico. **Casas Guerrero** stated that he was aware he was smuggling weapons and believed there were four to five guns inside the vehicle. **Casas Guerrero** stated that the driver of the vehicle, **De La Torre**, was aware of the weapons in the vehicle. **Casas Guerrero** admitted he was aware that it was illegal to bring ammunition into Mexico from the United States. **Casas Guerrero** stated he is not licensed to import/export firearms from the United States into Mexico.

In a post-*Miranda* interview **De La Torre** stated that he knew why he was there and that it was because he tried to bring guns into Mexico. **De La Torre** stated he was recruited by an individual known as "Bryan" to travel to Phoenix, Arizona to retrieve weapons, return to Mexico, and deliver the guns to different people. **De La Torre** stated that he has personally smuggled weapons to Mexico on several occasions and that he is normally paid \$500 per rifle and \$200-\$300 per pistol he smuggles to Mexico. **De La Torre** stated that he was aware he was smuggling weapons and expected to receive \$2000 for the transportation of the weapons on this occasion. **De La Torre** stated that **Casas Guerrero** was with him each time he has smuggled guns into Mexico. **De La Torre** stated that he was aware that it was illegal to bring ammunition into Mexico from the United States. **De La Torre** stated he is not licensed to import/export firearms from the United States into Mexico.

The firearms and magazines found in the vehicle qualify as United States Commerce Control List items and therefore are prohibited by law for export from the United States into Mexico without a valid license. Neither **De La Torre** nor **Casas Guerrero** possessed nor presented a license to export firearms or magazines from the United States into Mexico.